

US EPA ARCHIVE DOCUMENT



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

[www.deq.virginia.gov](http://www.deq.virginia.gov)

L. Preston Bryant, Jr.  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

June 30, 2006

Mrs. Judith M. Katz  
Director, Air Protection Division  
US EPA Region III  
1650 Arch Street (3AP00)  
Philadelphia, PA 19103-2029

Dear Mrs. Katz:

The purpose of this letter is to formally transmit the June 30, 2006 status reports and supporting documents for the Early Action Compact areas of **Roanoke** and the Northern Shenandoah Valley to EPA Region III. This submission is in response to the requirements of the EAC program and EPA guidance on this subject.

These status reports clearly document the great amount of continuing effort and progress that has been made at both the local and state levels to meet all the commitments of the ozone early action plans for these areas. As a result of these plans, both areas are now in compliance with the 8-hour ozone standard.

Please contact me if you have any questions concerning these reports, and thank you again for your support throughout this successful air quality planning effort.

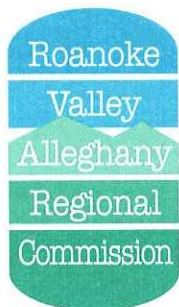
Sincerely,

**/ S / TRB – June 30, 2006**

Thomas R. Ballou, Director  
Office of Air Data Analysis

Enclosures

cc: M. Morris, EPA R3  
E. Wentworth, EPA R3  
D. Cole, EPA OAQPS  
J. Sydnor, VA



## The Regional Commission

313 Luck Avenue, SW / PO Box 2569 / Roanoke, Virginia 24010

TEL: 540.343.4417 / FAX: 540.343.4416 / [www.rvarc.org](http://www.rvarc.org) / [rvarc@rvarc.org](mailto:rvarc@rvarc.org)

June 30, 2006

Mr. James E. Sydnor  
Acting Air Division Director  
VADEQ  
629 E. Main Street  
Richmond, VA 23219

**RE: Ozone Early Action Plan for Roanoke Valley MSA  
June 30<sup>th</sup> 2006 Progress Report Submittal to US EPA**

Dear Mr. Sydnor:

This submittal includes the 6<sup>th</sup> semi-annual Early Action Compact status report for The Roanoke Valley Region in the Commonwealth of Virginia. The following elements are included:

- Documentation of any progress from the period January 2006-June 2006, including:
- Major events and meetings that have taken place;
- Control measures that have already been implemented;
- Implementation schedules for control measures that will be implemented by end of year 2006; and
- Impediments to implementation

If you have any questions regarding our submittal, please contact me at (540) 343-4417.

Sincerely,

Wayne G. Strickland  
Executive Director

# **6<sup>th</sup> Semi-Annual Status Report**

**for**

## **Roanoke Valley Area Ozone Early Action Compact Area**

**January - June 30, 2006**

Roanoke  
Valley  
Alleghany  
Regional  
Commission



## PROJECT ORGANIZATION AND SUMMARY TO DATE

This report represents the 6<sup>th</sup> semi-annual status report for the Roanoke Valley Early Action Compact (EAC) area in Virginia. This area consists of the Cities of Roanoke and Salem, the Counties of Roanoke and Botetourt and the Town of Vinton. As such, this report documents the status and progress made towards the development and implementation of an Early Action Plan (EAP) to address ground level ozone pollution in the area. Specifically, this report covers the period from January 1 to June 30, 2006.

The EAC process in the Roanoke Valley area began in the fall of 2002, with the formal development and signing of the Early Action Compact in December 2002. A series of required documents have been produced, culminating in the submission of the official EAP in March 2004. Provided below is listing and timeline of the products and documents provided by the Roanoke Valley EAC effort:

**December 12, 2002** – Early Action Compact for the Roanoke Valley Region

**June 16, 2003** – Potential local control list submission

**June 30, 2003** – 1<sup>st</sup> annual status report for January to June 2003

**December 31, 2003** – 2<sup>nd</sup> annual status report for July to December 2003

**March 31, 2004** – Completed local Early Action Plan submitted to DEQ & EPA

**December 31, 2005** – State Implementation Plan

These documents, along with other information concerning the EAC program and other EAC areas, can be viewed and retrieved from the following EPA web site:

<http://www.epa.gov/ttn/naaqs/ozone/eac/index.htm>

Efforts on the state and local levels have now moved towards the implementation of the emissions control measures and other actions committed to in the EAP.

The remainder of this status report documents the major actions, milestones, and events that have occurred since the submission of the 5<sup>th</sup> Semi Annual Status Report for the Roanoke Valley Area Ozone Early Action Compact Area, June-December, 2005.

## EVENTS SUMMARY (January to June 2006)

Provided below is a listing of major events held, and actions taken, during the period covered by this status report. These developments contribute to the implementation of the local Ozone Air Quality Improvement Plan and associated nonattainment implications:

### Events Summary:

- **February 16, 2006** – Roanoke Valley Area Greenway Master Plan Update Public Meeting.
- **March 9, 2006** – Public Open House – 3:00 – 7:00 pm – Roanoke Higher Education Center. Air Quality, Ozone and Ridesharing information was on display. This open house was advertised in the Roanoke Times and Roanoke Tribune.
- **May 24, 2006** – Filming of iRoanoke – Episode 19 to air in the fall concerning Air Quality.
- **May 25, 2006** – Virginia DEQ update to the MPO policy board concerning Ozone EAP progress.
- **June 1, 2006** – Ozone Early Action Plan Update to Roanoke Regional Chamber of Commerce Transportation Advocacy Group.
- **June 12, 2006** – A delegation of the Virginia Lung Association and Virginia DEQ met with meteorologists from WDBJ 7 (CBS Affiliate), WSLS 10 (NBC Affiliate) and FOX 27/27 concerning reporting air quality action days.



February 16, 2006 Greenway Public Meeting



May 25, 2006 RVAMPO Meeting

## **IMPLEMENTATION STATUS OF EARLY ACTION CONTROL MEASURES**

This section describes the status of each emission control measure included in the early action plan and the schedule for the measure's implementation. Additional successes, which were not anticipated at the adoption of the plan, are highlighted in yellow. These represent steps above and beyond what is called for in the Ozone EAP.

### **Local Controls**

#### **Section I of III "Heavy Duty Diesel and Diesel Equipment Strategies"**

##### ***1) Reduce Locomotive Idling, Implemented***

The intention of this measure is to increase operating efficiency and reduce emissions from Transportation activities. Norfolk Southern Railway Company has implemented an operating policy to reduce emissions from idling locomotives as allowable by ambient conditions being greater than 32 degrees.

Norfolk Southern Railway Company's contact for this measure is:  
Gibson Barbee  
Engineer Environmental Design  
540-981-5185

Identify types of controls and enforcement:

Conservative Assumption #1: 2002 Base Year- NS has been working on idle reductions prior to 2005, such that benefits may have occurred earlier.

Conservative Assumption #2: 20 switching units operated in the five county Roanoke maintenance area that have a utilization rate of 55%. This number is further reduced by 20% for times the unit is not immediately switched off or ambient temperature is less than 32 degrees Fahrenheit.

The measure was implemented in Summer 2003.

Results Estimated from Conservative Assumptions #1 and #2 above:

55% utilization, 45% not utilized and therefore turned off and not idling.



$[45\% * (24 \text{ hours / day}) * 365] = 3,942 \text{ hours not idling and turn off annually}$

$[3,942 * (1-.2)] = 3,153.6 \text{ hours not idling including 20\% safety factor per unit.}$

Each locomotive is therefore not idling an average of 3,154 hours annually. Assuming 20 units at 5 gallons diesel fuel per hour equates as follows (most burn closer to 6 gallons per hour such that again a safety factor is present):

$3,153.6 \text{ hours} * 5 \text{ gal/ hour} * 20 \text{ units historically operated within the Valley} = 315,360 \text{ gal diesel not combusted.}$

## **2) *Limiting Idling Times for School Busses, Implemented***

Local School Systems (City of Roanoke, City of Salem, County of Roanoke and County of Botetourt) have agreed to limit idling times for school busses through internal policy and management. This measure was implemented in Fall 2005 and is a continuous measure of the EAP.

## **3) *Retrofit Roanoke County School Busses, Implemented***

Diesel engine retrofits were completed in June of 2005 (100 units total). Questions concerning the Roanoke County School Bus retrofit program can be directed to Danny Carrol at 540-387-6577.

Diesel engine retrofits for the City of Roanoke school busses, which began in 2004 have been completed. The entire City of Roanoke school bus fleet (140 school busses) have either been retrofitted (older busses) or purchased new with emission control equipment included. City of Roanoke School System participation in the diesel retrofit program was not anticipated in the original Ozone Early Action Plan (EAP), these 140 busses represent progress above and beyond the original EAP. For more information about City of Roanoke School System retrofit program please contact Ronnie Cassell at 540-853-2807.

## **4) *City of Roanoke - Purchase of 5 Bio Diesel Compatible Solid Waste Trucks***

In 2003 the City of Roanoke began purchasing bio diesel compatible solid waste trucks. From 2003 to this reporting period the City purchased five trucks. For the January-June 2006 period, no additional trucks were purchased. The implementation for this measure will be completed by 2007.

**5) City of Roanoke – Purchase of Ethanol Compatible Vehicles**

In 2003 the City of Roanoke purchased eleven sedans and station wagons that are ethanol compatible. By 2007 the city will purchase an additional fifteen-ethanol compatible vehicles. During the January to June 2006 reporting period, no additional ethanol compatible vehicle were purchased. Implementation of this measure will be completed in 2007.

**6) City of Roanoke – Purchase of 9 Bio Diesel Trucks**

In 2003, City of Roanoke purchased nine new trucks that will operate using bio-diesel fuel. By 2007, City of Roanoke will purchase an additional twelve bio-diesel fuel compatible vehicles. No additional Bio Diesel Trucks were purchased during the January to June 2006 reporting period.

**7) City of Roanoke – Purchase of 2 Hybrid Electric Vehicles, On Schedule**

The City of Roanoke purchased 1 hybrid Ford Escape for evaluation in 2005. Future purchases are projected to follow prior to 2007. No additional purchases were made during the January to June 2006 reporting period.

**8) County of Roanoke – Purchase of Low Emission Vehicles,  
Implemented**

The County of Roanoke purchased **5 (five) hybrid electric vehicles**: 2 Honda Civic, 1 Toyota Prius, and 2 Ford Escape Hybrids in 2005. Future purchases are projected to follow prior to 2007. No additional purchases were made during the January to June 2006 reporting period.

**9) County of Roanoke – Fleet Management Education and Training,  
Implemented**

The County of Roanoke has completed this strategy, which resulted in the production of a training video so that new hires could be trained on the County's fleet management policy regarding Air Quality. Approximately 220 individuals have received the training as of November 2005. This is a continuing measure of the EAP.

**Additional Success – Staff Training/ Air Quality Video**

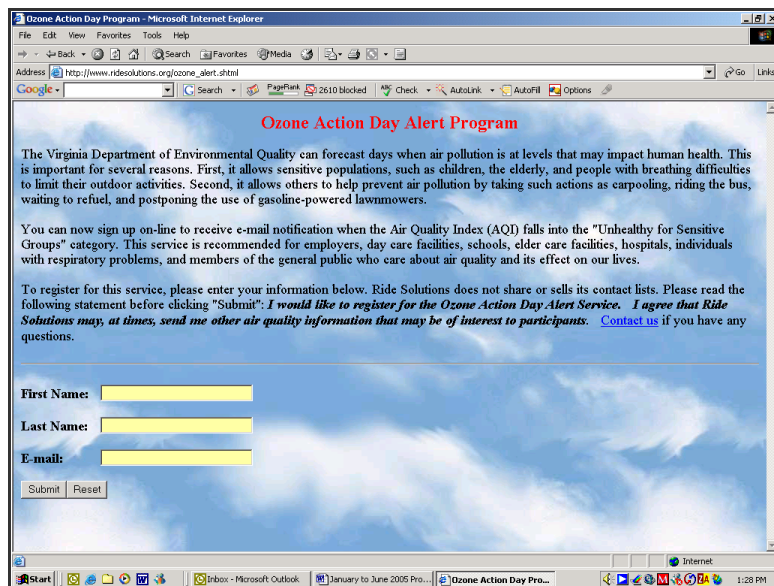
The resulting Staff Training/ Air Quality Video is also useful as a public education tool. As such, the video has been played extensively on the local public access

channel RVTV 3. This tool supplements the general public education components of the Ozone EAP.

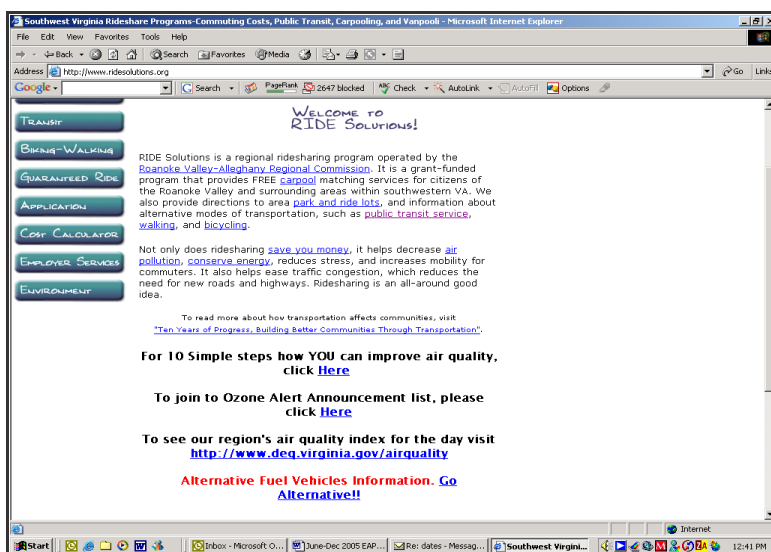
## Section II of III “Air Quality Action Day, Public Education and Stationary Sources Strategies.”

### *Air Quality Action Day, On Schedule*

Fortunately, there has not been an Air Quality Action Day since the development of this strategy in early 2004. Nonetheless, the initial contact database has grown to over 350 first line contacts in the public and private sectors. These contacts are responsible for forwarding the message within their organizations. Here is an image of the web page where individuals and businesses can register to be on the Ozone Alert Listserv. The Air Quality Index (AQI) is reported to participating organizations when the AQI is forecasted to reach unhealthy levels.



The RIDE Solutions (RS) Program of the Roanoke Valley-Alleghany Regional Commission is charged with managing the Air Quality Action Day program. Organizations and citizens can enroll for the Action Day notification list from the RIDE Solutions homepage, or by calling the RIDE Solutions office. In addition, the following media organizations have agreed to report Air Quality Action Days during their local programming:



WBDJ 7 (CBS)  
 K92 (Radio)  
 WSLs 10 (NBC)  
 Adelphia (Cable)  
 RVTv (Local Access)  
 Cox (Cable)  
 WVTF (Radio)  
 WFIR (Radio)  
 VIBE100 (Radio)  
 Roanoke Civic Center (Marquee Variable Message Sign)  
 Roanoke Times (Newspaper)  
 Clear Channel (Radio System)  
 Local on the 8s (Weather Channel)  
 National Public Radio

RIDE Solutions has also added an additional feature to its services to lower Single Occupancy Vehicle) SOV drivers in the region. Commuters who are looking for more temporary or one trip carpool matches can now use the RIDE Solutions bulletin board for carpool matching. It encourages citizens to actively seek out ways in which they can reduce traffic and air pollutions. This forum also provides individuals with more flexibility in their mobility. The RIDE Solutions bulletin board can be viewed at:

<http://rvarc.myfreeforum.org/forum2.php&sid=c3d45a73bd578d4dddbef949286d66cc>.

Or it can be accessed from the Regional Commission's homepage at <http://www.rvarc.org>. Ride Solutions currently has over 300 members participating in the alternative transportation program.

The Ozone Early Action Plan also has an official website ([www.rvarc.org/work/eap.htm](http://www.rvarc.org/work/eap.htm).) The Air Quality Action Day program is the lynchpin of the public involvement component in the Ozone EAP.

### ***11) Early Morning or Late Evening Refueling, Implemented***

All local governments have agreed to, and implemented, this program. Some local governments, such as the City of Salem, have even turned off their fuel pumps during daytime hours from May to October. Many private sector organizations have also voluntarily agreed not to refuel their vehicles between 8:30 and 4:30 pm

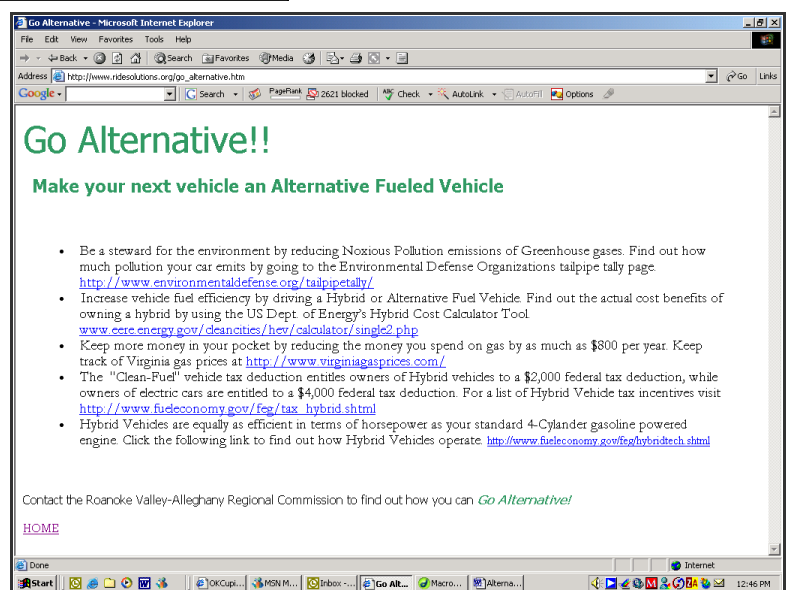


during the Ozone season. The Commonwealth has also agreed to close pumps on predicted ozone action days. Private sector participants include:

Goodwill Industries	Addecco Staffing
Salem Avalanche	Workforce Staffing
Workman Oil	Echostar
COX Communications	RADAR
Roanoke Times	Spee-Dee Oil Change
Southern Soft Cloth Auto Wash	Roanoke/Botetourt Fitness Club
Liberty Cab	Roanoke Downtown Sports Club
Yellow Cab	Cardinal Bicycles
Valley Metro	Peddlers Bicycles
Blue Ridge Home and Garden Magazine	East Coasters
Blue Ridge Outdoors	Air-Lee Dry Cleaners
Hooptie Ride Limousine Service	Safe Kids Coalition
Breathe Roanoke Asthma Coalition	Roanoke Biz2Biz
Wachovia Regional Headquarters	

### *Promotion of Alternative Fuel Vehicles, Implemented*

This strategy is designed to encourage citizens to consider air quality when purchasing a new vehicle. Staff has chosen not to promote one brand or make of vehicle over another. In background research for this strategy, staff discovered that hybrid electric vehicles were in fairly high demand; indicating that fuel

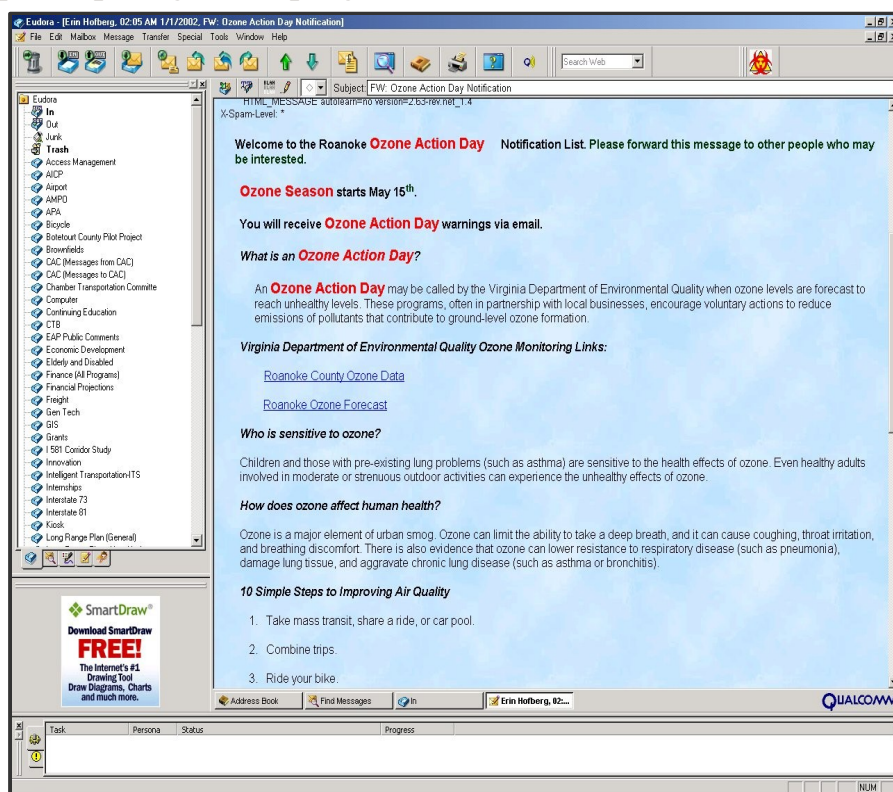


economy and/or environmental concerns are present in some consumer's purchasing behavior.

### ***13) Media and Public Relations Concerning Air Quality Action Days, Implemented and a continuing measure of the EAP***

This strategy is the direct complement of strategy #10. Various local media outlets have agreed to alert the public on Air Quality Action Days. As of June 2005 the following media outlets are participating in the program:

WBDJ 7 (CBS)  
K92 (Radio)  
WSLS 10 (NBC)  
Adelphia (Cable)  
RVTV (Local Access)  
Cox (Cable)  
WVTF (Radio)  
WFIR (Radio)  
VIBE100 (Radio)  
Roanoke Civic Center  
(Marquee Variable  
Message Sign)  
Roanoke Times  
(Newspaper)  
Clear Channel (Radio  
System)  
Local on the 8s (Weather  
Channel)



Air Quality Action Day Test Email

### ***14) Public Transit Incentives, Implemented***

**Valley Metro** - Valley Metro's Operations, Maintenance, and Administrative facility is located at 1108 Campbell Avenue SE. The Campbell Court Transportation Center is located in the heart of downtown Roanoke at 17 Campbell Avenue SW, and is a modern intermodal facility which provides connections between Valley Metro, The Smart Way, the Ferrum Express (weekend college service) and Greyhound. Valley Metro runs 16 routes in Roanoke, Salem, and Vinton. Valley Metro can be contacted by the public at (540) 982-2222, with a

live operator available between the hours of 5:45am and 8:15pm, Monday through Saturday. The office number is (540) 982-0305 and office hours are Monday through Friday, 7:30am to 4:30pm.

In 2005 Valley Metro and RIDE Solution distributed over 300 free bus passes throughout the region to encourage transit ridership and alternative transportation.

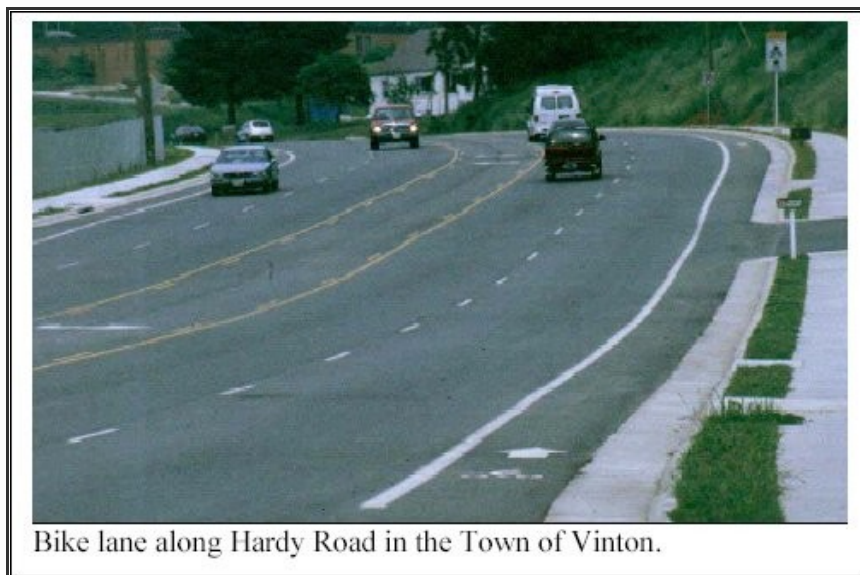
#### **Additional Success - Valley Metro Summer Youth Pass**

The Greater Roanoke Transit System (Valley Metro or VM) is continuing a \$20 Summer Youth Pass that began in the summer of 2005. This pass allows youth, who are enrolled in school during the regular school year; unlimited fixed transit rides during the summer break. The motivation for this pass is to allow working age youth to find summer employment without having to rely on a private vehicle. The program seeks to encourage the development of a familiarity with public transportation that could carry over into adulthood. In the summer of 2005 Valley Metro sold 218 summer youth passes. They are hoping to add to this number during the summer of 2006.

The Community Transportation Council (CTC) solicited a local restaurant chain (Subway) to co-sponsor the program. They offer a 10% discount at 8 restaurant locations (located along bus routes), in the form of a coupon on the back of the RIDE-ON bus pass.

#### ***15) Bicycle Infrastructure and Amenities, On Schedule***

The *Bikeway Plan for the Roanoke Valley Area MPO* was developed with input from local governments and interested citizens. The *Bikeway Plan for the Roanoke Valley Area MPO* was adopted by the Roanoke Valley Area Metropolitan Planning



Bike lane along Hardy Road in the Town of Vinton.

Organization in August 2005 and replaces the 1997 *Bikeway Plan for the Roanoke Valley*. The plan implementation began in 2005 and will continue through 2007.

The *Bikeway Plan for the Roanoke Valley Area MPO* represents a coordinated effort by the Roanoke Valley Area MPO and local jurisdictions to facilitate development of a regional transportation network that accommodates and encourages bicycling as an alternative mode of travel and as a popular form of recreation in the MPO study area.

The *Bikeway Plan for the Roanoke Valley Area MPO* provides a coordinated and strategic approach to the development of a regional bicycling network that provides greater connectivity between activity centers and cultural resources such as greenways, public areas, downtown areas, commercial centers, employment concentrations, educational institutions, transit facilities, scenic corridors, and other points of interest in the MPO study area. The regional network outlined in this plan will also facilitate inter-jurisdictional connectivity between localities.

The Bikeway Plan should also facilitate the long-range transportation planning process, the Ozone Early Action Plan and the allocation of limited funding for bicycle and pedestrian improvements. This plan should be used in concert with local, regional, state, and national plans and/or policies including the VDOT Policy for Integrating Bicycle and Pedestrian Accommodations and the VTrans2025 Statewide Bicycle and Pedestrian Plan, as well as continued public involvement in the transportation planning process.

In an attempt to promote the Bikeway Plan, staff has provided the Roanoke County Board of Supervisors and the Vinton Town Council with a presentation overview of the plan and an outline for future implementation. Additional outreach materials, the Bikeway Plan and other information can be found at the Roanoke Valley-Alleghany Regional Commission's Bicycle and Pedestrian Planning web-site [www.rvarc.org/bike](http://www.rvarc.org/bike).

#### **Additional Success – Regional Greenway Master Plan Update:**

RVARC Staff partnered with the Roanoke Valley Greenways Commission to secure funding from a Virginia Department of Transportation Pilot Program to develop an update to the Conceptual Greenway Plan for the Roanoke Valley (adopted in 1995). This update is focusing on implementation and will contain both an implementation and funding strategy. In fact, Novozimes Biologicals Inc.



recently announced a \$250,000 (over 5 years) contribution to greenway completion.

*16) School Based Public Education, Implemented/ Ongoing*

RIDE Solutions provides K-12 education classes with the intention of fostering air quality awareness in youth. This program is in correspondence to the Standards of Learning (SOL) Life Sciences Section LS.12 that states that, “The student will investigate and understand the relationship between ecosystem dynamics and human activity. Key concepts include environmental issues such as air quality.” In this K-12 education program, RIDE Solutions educates the students about their affects on the environment and what they can do to help improve air quality. Specifically, RIDE Solutions staff would speak on the key concepts of:

- a) environmental issues of water supply, air quality, energy production and waste management;
  - b) food production and harvest;
  - c) change in habitat size, quality, or structure;
  - d) change in species competition; and
  - e) population disturbances and factors that threaten or enhance species survival.
- **March 17, 2006** Ride Solutions staff addressed elementary students at Mason’s Cove elementary (all day several classes of students).

In June and July 2005, Ride Solutions staff contacted approximately 50 daycares, preschools and summer camps in the Roanoke area to register them for the Ozone Action Listserv. These groups would then receive an e-mail in the event that the Ozone levels are forecasted to unsafe limits for sensitive populations. Such knowledge on behalf of childcare facilities is mandated by the Department of Social Services (DSS). All organizations that provided information to RIDE Solutions staff will receive recognition by the Roanoke Valley-Alleghany Regional Commission as being participants of the Ozone Early Action Plan.

### ***17) Tree Canopy/ Urban Forestry, On Schedule***

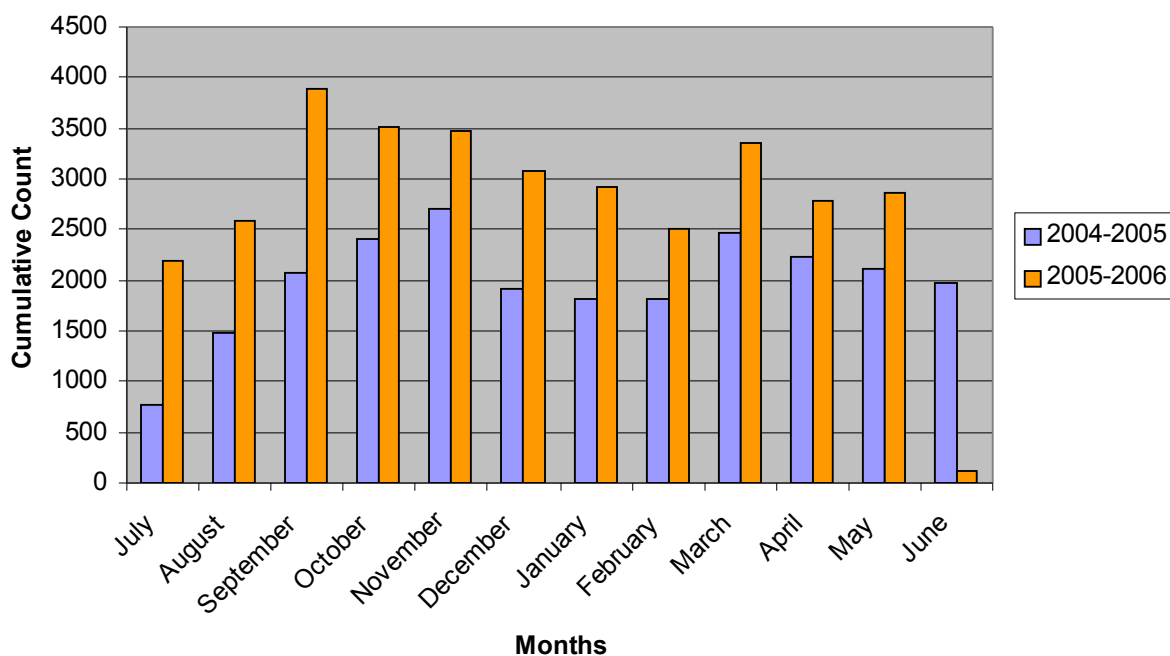
This strategy is on schedule and enjoying increased popularity. A summary of recent urban forestry activity follows:

- City of Roanoke: on schedule according to “City Urban Forestry Plan” and planted 250 trees and 1500 seedlings as a part of a reforestation effort for the January to June 2006 reporting period.
- Town of Vinton: planted 5 full grown trees in the January to June 2006 reporting period.
- County of Roanoke: on schedule to plant 100 trees this year (70 planted for the June-December 2005 reporting period)
- Friends of the Blue Ridge Parkway are also planting trees along the parkway in the region. The number of trees planted during this reporting period has yet to be determined.

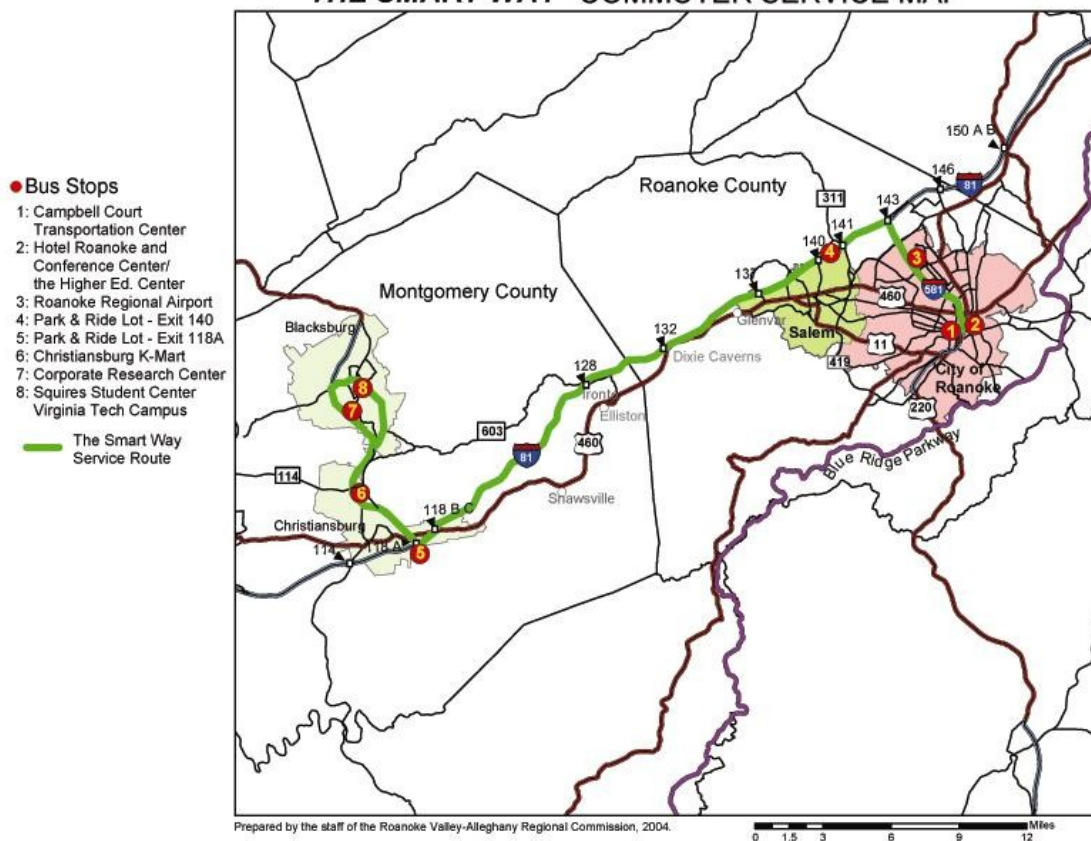
### ***18) Roanoke to Blacksburg Public Transit, Implemented***

The Smart Way service between Roanoke and Blacksburg has been successfully implemented and will remain in continuing measure of the EAP and service to the region’s citizens. The transit line makes 12 runs a day, 10 runs Saturday, between the Roanoke and New River Valleys. The fare is \$3.00. Ridership statistics for the past two months are summarized below: (note June 2006 is only a partial count.)

04-05 and 05-06 Fiscal Year Comparison



THE SMART WAY COMMUTER SERVICE MAP



### ***19) Open Burning, Implemented***

When issuing open burning permits the fire marshals of each locality are responsible for monitoring and enforcing open burning regulations in regards to air quality status. Some localities have a general ban on open burning.

### **Section III of III “Lawn and Garden Equipment Strategies.”**

#### ***Replacement of Gasoline Golf Equipment with Electric, Implemented 2005 and ongoing***

Regional Commission staff are working with local retailers to provide citizens with information on lawnmower trade-ins and purchasing electric mowers.

#### **Participating Lawn Mower Recycling Centers:**

##### ***Anderson Tractor Lawn and Garden Center***

21200 Virgil H Goode Hwy Rocky Mount, VA 334-2040

##### ***The Farm Store***

3112 Lee Hwy, Troutville, VA 966-4522

##### ***C&R Lawn Mower Shop***

7401 Hardy Rd. Hardy, VA 890-2275

##### ***Vinton Saw and Mower Service***

1227 E Washington Ave. Vinton, VA 342-6999

##### ***Second Time Around***

2921 Shenandoah Ave NW, Roanoke 342-2102

The Regional Commission has also developed this flyer to educate and encourage citizens to consider alternatives to gas powered lawn and garden equipment. The flyer will be distributed to retailers in the region.



## Is Your Old Lawn Mower Breaking Down??



Trade-in your old gasoline powered lawnmower for a newer, more efficient and environmentally friendly electric lawn mower. Recycling your old lawn mower ensures that the lawnmower will be discarded in an environmentally friendly fashion and you may even be entitled to a small monetary stipend towards the purchase of a new lawn mower.

### **Additional Success – Roanoke County Purchase of Low Emission Lawn and Garden Equipment.**

- Roanoke County has purchased 4, 17HP, EPA Phase II, zero turn mowers so far this year. They have a "3" rating on the air index.

### **Additional Regional Success - Cradle 2 Cradle**



The C2C Home Competition is a partnership between Smith-Lewis Architecture, the Roanoke Redevelopment Housing Authority, City of Roanoke and others. Information can be found at [www.c2c-home.org](http://www.c2c-home.org). The program was implemented in May 2005 and is ongoing.

The C2C housing competitions is based on environmental design concepts presented in the book "Cradle to Cradle" by noted UVA Professor William McDonough. A housing design competition has held using sites in the City of Roanoke. The competition attracted over 200 entries from an international pool of architects and designers. Eight homes (various winning designs) are slated for construction. A press release concerning the first home to go to construction follows:

### **C2C HOME HARRISON AVENUE COMPETITION BUILD**

**Competition Entrants: Stephen Feather AIA of Interactive Design Group  
and Richard Rife AIA of Rife + Wood Architects**

#### **Building Partners**

Developers: Blue Ridge Housing Development Corporation (Roanoke, Virginia)

Modular Construction: Southern Heritage Homes (Rocky Mount, Virginia)

Property: Roanoke Redevelopment Housing Authority

C2C Home is proud to announce the construction of the competition entry submitted by Stephen Feather AIA (The Interactive Design Group - Roanoke, Virginia) and Richard Rife AIA (Rife + Woods Architects - Roanoke, Virginia) on Harrison Avenue in Roanoke, Virginia. This attractive home will blend beautifully into the historic neighborhood of Gainsboro. It will be an affordable home available to low to moderate income buyers in a neighborhood of moderately priced single family homes. The house plan is designed for modular construction which will be constructed by Southern Heritage Homes in Rocky Mount, Virginia. Unlike traditional modular assembly line production, the unique system creates the house with stick construction under roof. They have a very efficient system and a high quality product.

We believe that this system lends itself beautifully to the cradle-to-cradle concept by:

- embracing green, non toxic and environmentally friendly materials,
- reducing construction waste,
- utilizing resource efficient systems,
- using local vendors, when available,
- providing adaptability by virtue of the nature of building with component parts that could be easily modified
- offering the possibility for de-construction and reclamation of materials after the house has served its purpose or needs modification.

Contact information:

C2C HOME c/o Smith Lewis Architecture  
18 W. Kirk Avenue  
Roanoke, Virginia 24011  
[info@c2c-home.org](mailto:info@c2c-home.org)

Media Coverage:

The following links to media coverage can be accessed at:

<http://www.c2c-home.org/coverage.htm>  
[Blue Ridge Home and Garden \(September 2004\)](#)  
[Environmental Construction + Design \(January 2005\)](#)  
[Environmental Construction + Design \(April 2004\)](#)  
[Environmental Construction + Design \(March 2005\)](#)  
[Interiors & Sources \(May 2004\)](#)  
[Interiors & Sources \(September 2004\)](#)  
[Leading Architecture Magazine \(September 2004\)](#)  
[Roanoke Times Article \(August 4, 2004\)](#)  
[Roanoke Times Article \(October 3, 2004\)](#)

[Roanoke Times Article \(May 24, 2005\)](#)

[Roanoke Times Horizon Editorial \(August 21, 2005\)](#)

Press Releases

[Media Advisor - Groundbreaking Ceremony \(May 2005\)](#)  
[Media Advisory - A Ground Breaking Idea is Breaking Ground \(May 2005\)](#)  
[World Acclaimed Designers Jury C2C Home Winners \(January 2005\)](#)  
[World Acclaimed Designers Select C2C Home Winners \(January 2005\)](#)

Resources/funding:

Most committed resources are from private sector and non-profit groups. There is local government support through the City of Roanoke. Resources are expected to be adequate for the constructions of the initial eight houses announced at the May 24, 2005 groundbreaking.

*Additional information:*

See <http://www.c2c-home.org/index.htm>





A. Control Measure	B. Summary Description of Measure	C. Program/Measure Status	D. Specific Implementation Date	E. VOC Reduction	F. NOx Reduction	G. Resources (FTE's, \$\$)	H. Additional Information
<b>31 Roanoke area, VA (Effective date of nonattainment designation deferred)</b>							
Reduce locomotive idling	Reduction of locomotive idling by the Norfolk Southern Railway Co.	Measure has been fully implemented at this time	May-05	0	0.153 TPD		
Limit idling-school buses	Limit on idling times for school buses through internal policy and management	Measure has been fully implemented at this time	May-05	0	0.003 TPD		
Retrofit 100 school buses-oxidation catalyst	Retrofit of 100 school buses in Roanoke County	Fully implemented	July, 2004	0.586 TPY	1.67 TPY	144,000	
Retrofit 102 school buses-oxidation catalyst	Retrofit of 119 school buses in Roanoke City - Purchase of 21 new buses with controls	Fully implemented	July, 2004	NQ	NQ	124,000 - retrofits only	
Bio-diesel solid waste trucks-purchased	Purchase of bio-diesel trucks by Roanoke City	In 2003 the City of Roanoke began purchasing bio-diesel solid waste trucks. Five trucks have been purchased as June 2006.	2003 - Ongoing	0	0.27 TPY		
Ethanol alternative fuel vehicles	Purchase of ethanol alternative vehicles by Roanoke City	11 sedans and station wagons purchased since 2003. 15 additional vehicles expected to be purchased.	2003 - Ongoing	NQ	NQ		
Biodiesel ready trucks	Purchase of bio-diesel trucks by Roanoke City	9 new trucks purchased since 2003. Additional 12 trucks to be purchased.	2003 - Ongoing	NQ	NQ		
Hybrid vehicles	Purchase of hybrid vehicles by Roanoke City	One vehicle purchased. Second one to follow shortly.	Jun-05	<0.001 TPD	<0.001 TPD		
Low emissions vehicles	Purchase of low emissions vehicles	Five vehicles purchased in 2005. More to follow.	Jun-05	<0.001 TPD	<0.001 TPD		
Implement effective environmental driving	Develop training materials and video on air quality	220 Roanoke County employees trained	Nov-05	NQ	NQ		
Public education: Air Quality Action Day	An area-wide program of mandatory and voluntary actions to reduce ozone precursor emissions during predicted high ozone days	Program fully implemented	May-05	NQ	NQ	0.5 FTE	
Timing of refueling vehicles	Local and state commitments to limit refueling of vehicles during the ozone season. 14 private companies also participating in this program	Program fully implemented	May-05	NQ	NQ		
Promote alternative fuel vehicles	Promotion of alternative fuel vehicles as part of overall emission reduction program - web based	Program fully implemented	2005 - Ongoing	NQ	NQ		
Media/public relations program	Public outreach and information program to educate and inform public on air quality issues and specific ozone action days - 13 media outlets participating	Program fully implemented	Jun-05	NQ	NQ		
Public transit incentives	Overall program to promote the use of various transit options	300 free bus passes distributed, discount summer youth pass program, substantial increase in transit ridership is continuing and documented	May-05	NQ	NQ		
Bike Infrastructure and Amenities	Overall program to promote bicycle usage	Regional plan developed and currently being implemented	2005 - Ongoing	NQ	NQ		
Expand public education program	Outreach program to K-12 classes. Outreach to daycare, preschools, and summer camps	Materials produced and class arrangements being made. 50 participating daycares, preschools, and camps	2005 - Ongoing	NQ	NQ		
Tree planting program	Program to plant trees for environmental purposes	350 trees and 1,550 seedlings planted thus far in 2006	2005 - Ongoing	NQ	NQ		
Mass transit to Blacksburg	Bus service between Roanoke and Blacksburg	Ridership up to 4,000 per month	2004 - Ongoing	0.009 TPD	0.004 TPD	950,000	
Replace gas golf carts w/electric	Purchase/use electric golf carts at local courses	In progress	End of 2005		0.061 TPY		
Replace gas mowers w/electric	Program to purchase new or electric lawn mowers	Five lawn mower sales and recycling centers currently participating in this program	2005 - Ongoing	0.017 TPD	0.001 TPD		
Open burning ban -expanded	Restriction of open burning on an episodic and/or seasonal basis	Program fully implemented	May-05	0.56 TPD	0.24 TPD		To be replaced by more restrictive state rule in 2007
Mandatory Restriction lawn equipment usage during ozone action days	Mandatory restriction of landscaping activities by local and state agencies during high ozone days	Program fully implemented	May-05	0.366 TPD	0.094 TPD		
Voluntary Private Sector Restriction lawn equipment usage during ozone action days	Voluntary restriction of landscaping activities by businesses and residents during high ozone days	Program fully implemented	May-05	0.072 TPD	0.016 TPD		
Cradle to Cradle Design Competition	Design and construction of environmentally friendly houses	Eight houses designed and slated for construction	2005 - Ongoing	NQ	NQ		
Regional Reduction in NOx emissions	Regional program to reduce ozone transport by reducing NOx emissions from power plants	Fully implemented by state regulation during 2004 ozone season	May 31, 2004	NQ	NQ		11,000 tons/per season reduced in VA between 2002 and 2005. Over 150,000 tps reduced in VA and adjacent states
National Low Emission Vehicle Program	Requirement for the sale of low emissions vehicles	Program fully implemented by state regulation	1999	NQ	NQ		
Stage1 Vapor Recovery	Requirement for use of Stage I vapor recovery equipment at gasoline service stations	Fully implemented in Roanoke County, and the Cities of Roanoke and Salem	May-04	640.9 TPY	NA		
CTG RACT -- CTG VOC RACT and NOx RACT	Expansion of existing source VOC control regulations and non-CTG RACT for major NOx sources	Fully implemented region-wide by state regulation	Nov-05	355.5 TPY	288.4 TPY		
State Cutback Asphalt Regulation	Restriction on the use of cutback asphalt	Fully implemented region-wide by state regulation	Nov-05	1.75 TPY	NA		
Enhanced Ozone Forecasting tool	Preparing daily ozone forecasts during the ozone	Program is fully implemented	May-05	NQ	NQ	70,000 & 1 FTE	

Early Action Compacts December Progress Summary Table

A. Control Measure	B. Summary Description of Measure	C. Program/Measure Status	D. Specific Implementation Date	E. VOC Reduction	F. NOx Reduction	G. Resources (FTE's, \$\$)	H. Additional Information
Comments:							

# Roanoke Clean Air Plan



## ***Roanoke Ozone Early Action Area***

### ***State Air Quality & Program Update***

**June 30, 2006**



## TABLE OF CONTENTS

1.	INTRODUCTION	3
2.	AIR QUALITY UPDATE	3
3.	EMISSIONS INVENTORY UPDATE	7
4.	REGIONAL/STATE PROGRAMS UPDATE	10
5.	CONTROL PROGRAM & MEASURES SUMMARY	16

## LIST OF APPENDICES

APPENDIX – Control Program and Measures Summary

# ***Roanoke Ozone Early Action Area Plan State Air Quality & Program Update – June 30, 2006***

## **Introduction**

Provided in this report is a status of the state efforts to assist the Roanoke Ozone Early Action Compact (EAC) Area in implementing the commitments contained in the Early Action Plan for the area. This plan was submitted as a State Implementation Plan (SIP) by the Virginia Department of Environmental Quality (VADEQ) on December 20, 2004 on behalf of the Commonwealth and the localities participating in the EAC process.

Since the formal submission of this plan, great strides have been made at the local, state, and regional levels to both implement control measures and produce emission reductions in ozone precursor pollutants. In turn, these controls and emission reductions have continued to translate into cleaner air for the Roanoke area and throughout Virginia.

To demonstrate this progress in term of improved air quality, reduced emissions and pollutant transport, and the implementation of controls, the following discussed in the remainder of this report:

- Recent air quality improvement trends and observed reductions in regional ozone transport
- Updated 2005 emissions inventory demonstrating progress towards 2007 attainment goals.
- Implementation of regional and state programs contributing to the EAP process.
- Summary and status of control measures implemented as part of the Roanoke EAP.

## **Air Quality Update**

As the 2006 ozone season begins, air quality continues to improve in the Roanoke area. This is demonstrated by the fact that the area recorded no exceedances of the 8-hour ozone standard since 2003. The improvement of air quality continued in 2005 despite weather more conducive to ozone formation than in previous years. This trend in air quality improvement is documented below from highs recorded in the late 1990s. As a result, the Roanoke area is now in compliance with the 8-hour ozone standard. Thus far, no exceedances have been recorded in the Roanoke area during 2006.

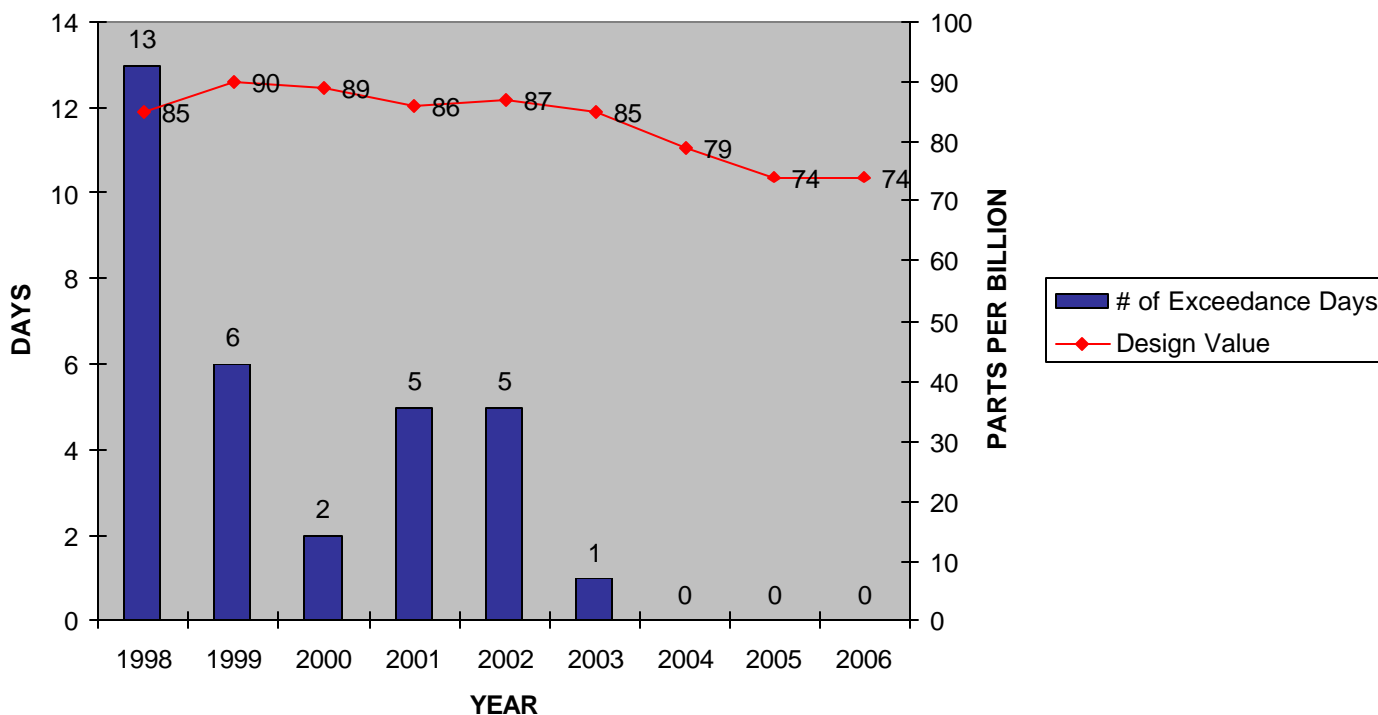


**Table 1 – Roanoke Ozone Exceedance & Design Value Trends**

<b>YEAR</b>	<b># OF EXCEEDANCE</b>	<b>3-YEAR DESIGN VALUE</b>
1998	13	<b>85 Parts Per Billion (PPB)</b>
1999	6	<b>90 PPB</b>
2000	2	<b>89 PPB</b>
2001	5	<b>86 PPB</b>
2002	5	<b>87 PPB</b>
2003	1	<b>85 PPB</b>
2004	0	<b>79 PPB</b>
2005	0	<b>74 PPB</b>
2006*	0*	<b>74 PPB*</b>

\* Unofficial – Partial season data

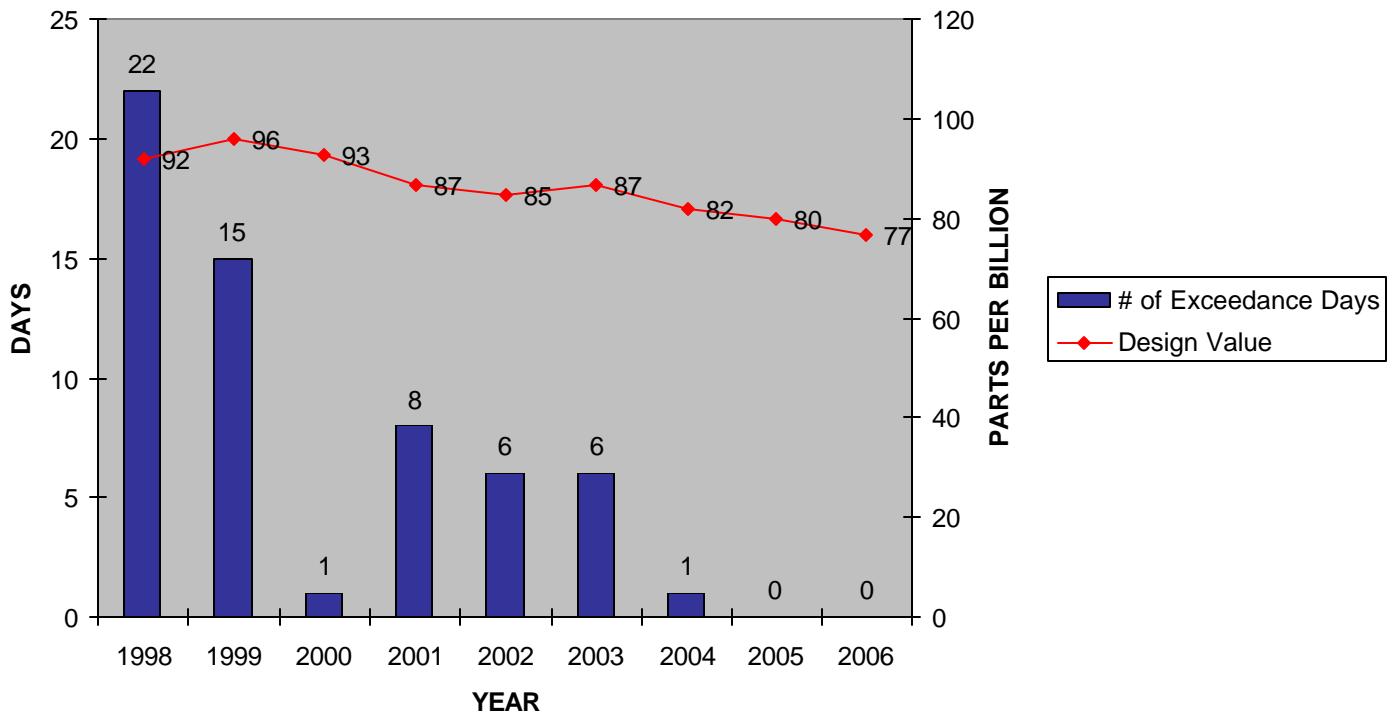
**Figure 1 – Roanoke Ozone Exceedance & Design Value Trends**



Of equal or even more importance than the local ozone air quality improvement in Roanoke is the trends being observed in the reduction of ozone being transported in to Virginia and the EAC areas. Small areas like Roanoke and Winchester, with relatively small local ozone precursor pollutant emissions are significantly impacted by the regional pollutant load of ozone that is generated in upwind areas and transported into these areas by typical summer weather patterns.

To track and analyze the influence of transported ozone, Virginia has a long standing high-altitude monitor in the Shenandoah National Park (SNP) at Big Meadows. It is well accepted that high ozone values observed at this monitor is reflective of pollution being transported into Virginia from areas west of this monitoring station. As shown in the graph below, ozone air quality has also improved significantly at the SNP monitor.

**Figure 2 – Big Meadow (SNP) Ozone Exceedance & Design Value Trends**



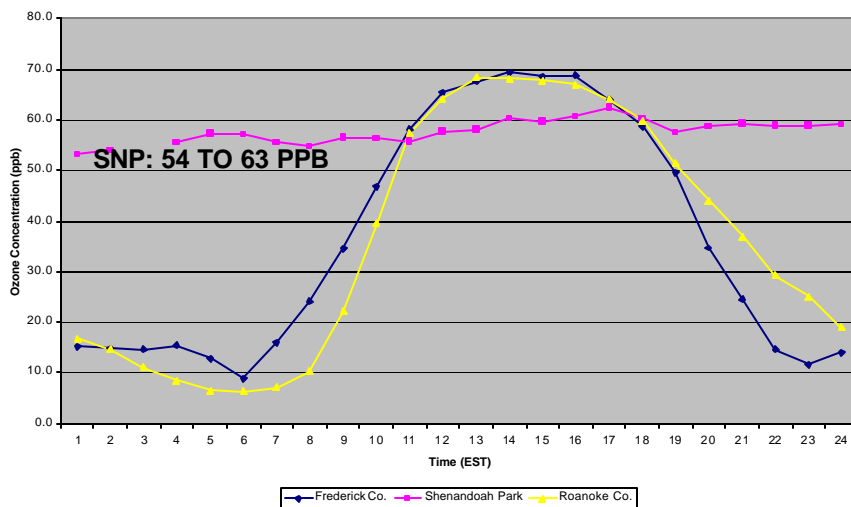
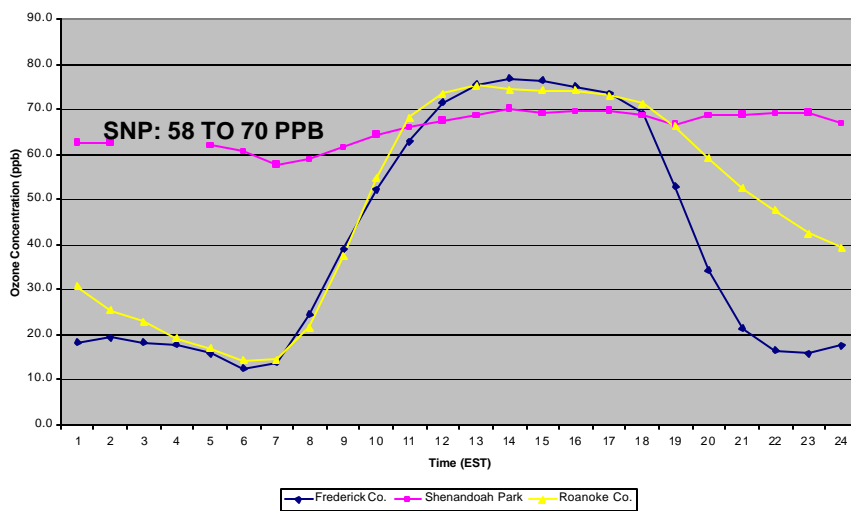
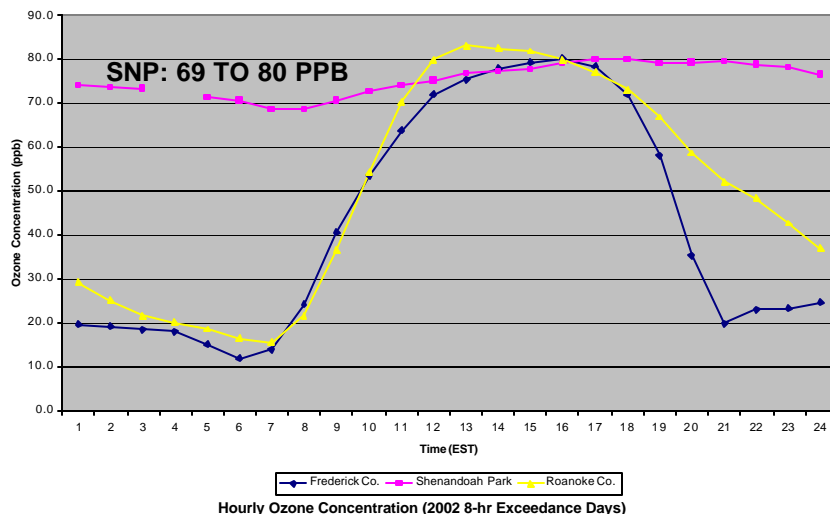
To investigate this reduction in transported pollution, the following analysis was performed. The table and charts presented below and on the next page show that the average ozone levels measured at Big Meadows during ozone exceedance days has dropped from 1998 to 2005 by approximately 15 ppb.

**Table 2 – Range of Big Meadows Hourly Average Concentrations**

YEAR	AVERAGE CONCENTRATION RANGES
1998	69 TO 80 PPB
1999	65 TO 76 PPB
2000	67 TO 74 PPB
2001	68 TO 75 PPB
2002	58 TO 70 PPB
2003	70 TO 77 PPB
2004	56 TO 69 PPB
2005	54 TO 63 PPB

**Figure 3-5: Reduction in Ozone Transport (1998, 2002, & 2005)**

Hourly Ozone Concentration (1998 8-hr Exceedance Days)



This reduction in the regional ozone load is most likely due to the numerous control programs implemented to reduce ozone precursor emissions on the state and national levels. Most significant of these, the regional reduction of Oxides of Nitrogen (NO<sub>x</sub>) emissions from power plants. This analysis of transport will be updated to 2006 once the data becomes available.

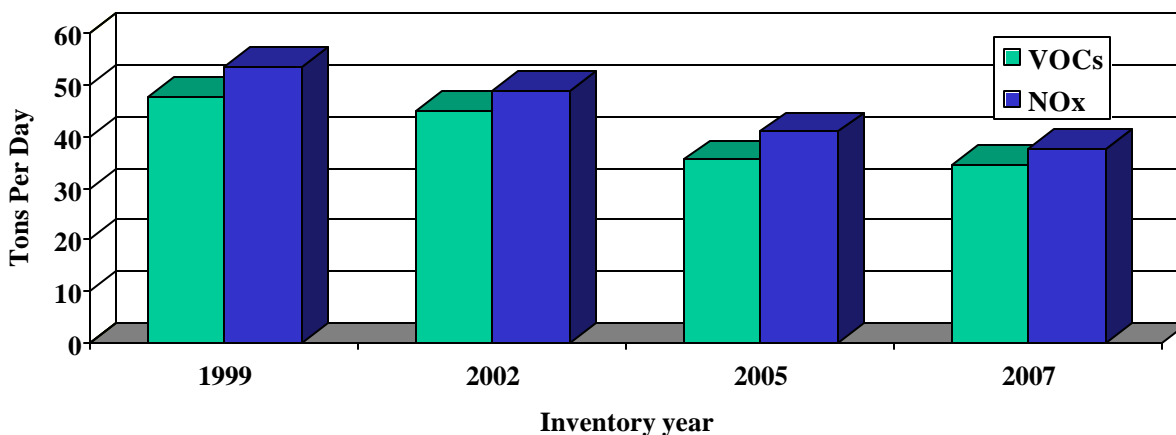
### **Emissions Inventory Update**

To demonstrate that the Roanoke area is making good progress towards the emissions reductions committed to in the EAP, an 2005 emissions inventory for the area has been developed and is presented below along with a comparison to the 1999, 2002, and 2007 emissions inventories developed to support the planning process. The 2005 estimates have been updated from the last report using actual point source data reported through the emission statement and update program.

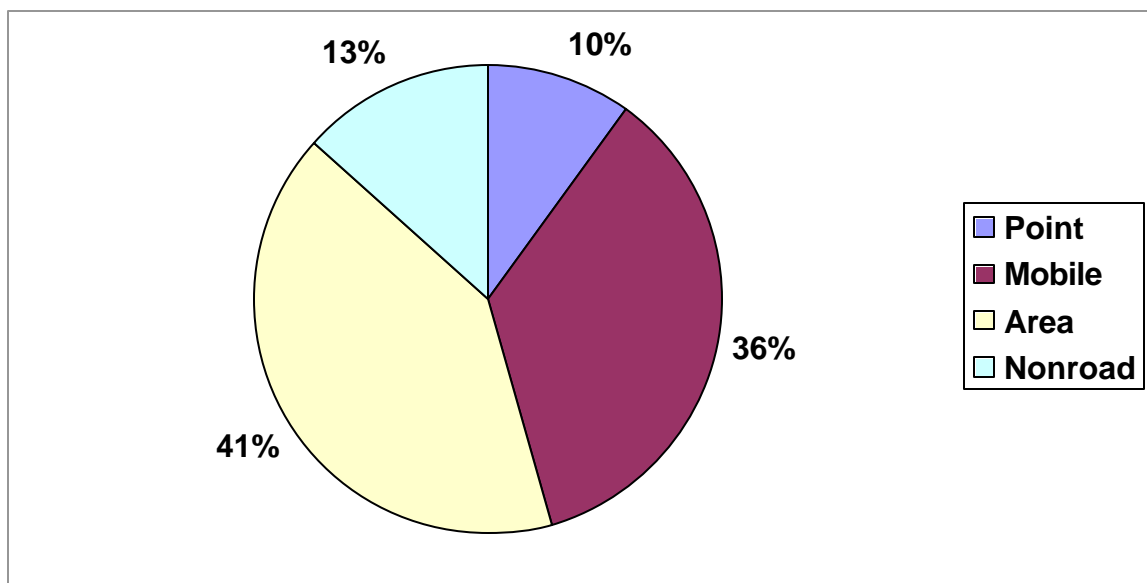
**Table 3 – Roanoke Area Emissions Inventories and Trends**

Source Category	1999 (Baseline)	2002 (Interim)	2005 (Current Year)	2007 (Control Case)
<b><i>Volatile Organic Compound (VOC) Emissions in tons/day</i></b>				
Point Sources	4.551	3.518	3.510	3.927
Area Sources	18.845	19.360	14.590	15.300
Non-road Sources	6.063	5.922	4.718	4.352
Mobile Sources	18.074	16.071	12.600	10.813
<b>Totals:</b>	<b>47.533</b>	<b>44.871</b>	<b>35.418</b>	<b>34.392</b>
<b><i>Oxides of Nitrogen (NO<sub>x</sub>) Emissions in tons/day</i></b>				
Point Sources	9.312	7.231	6.560	7.086
Area Sources	5.091	5.254	3.590	5.293
Non-road Sources	7.877	8.036	5.201	6.424
Mobile Sources	31.036	28.336	25.500	19.481
<b>Totals:</b>	<b>53.316</b>	<b>48.857</b>	<b>40.851</b>	<b>38.284</b>

**Figure 4 – Roanoke Area Emissions Inventory Trends**



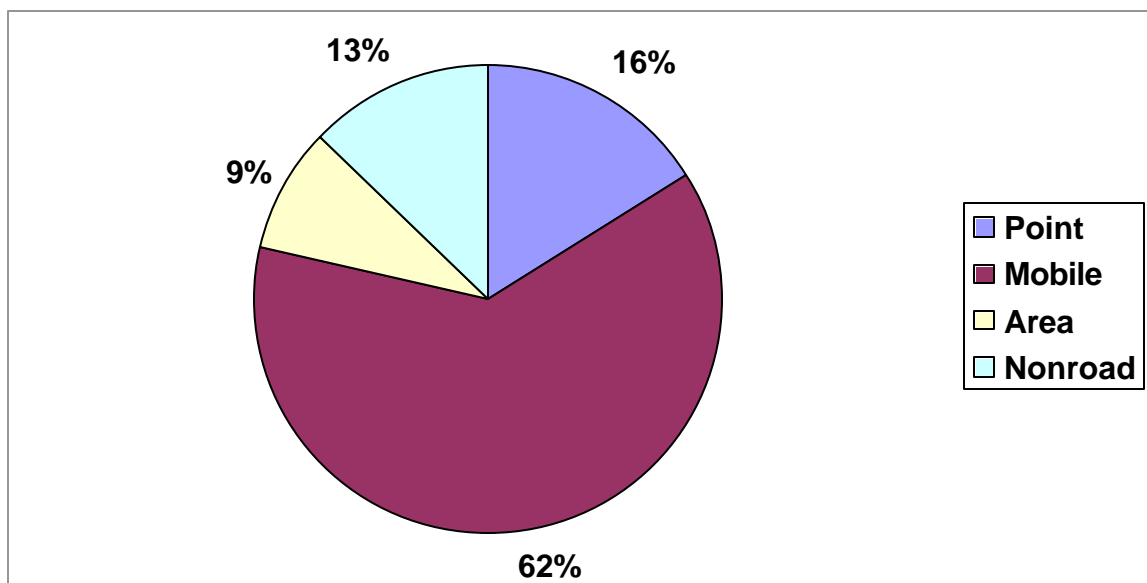
**Figure 5 - 2005 Baseline Ozone Season Daily Emissions of Volatile Organic Compounds (VOC)**



Summary of the Roanoke Valley Current VOC Emissions Inventory for Calendar Year 2005	
Major Source Categories	Emissions (tons/day)
<b>Major Stationary Point Sources</b>	
28 individual facilities (Botetourt: 7, Roanoke Co.: 12, Roanoke City: 5, Salem City: 4) - Description: Includes cement production, metal works, minerals production, gas terminals.	3.51 tpd
<b>On-Road Mobile Sources</b>	
Motor Vehicles on Public Roads - <b>Description:</b> local and through traffic on the I-81 corridor. Large percentage of heavy-duty diesel trucks. Also, vehicle traffic on all other public roads from major arterials to local roads.	12.6 tpd
<b>Area Sources</b>	
Use of Solvent-based Products - Description: paints, cleaners, consumer products, & others. Gasoline Distribution & Marketing - Description: Gasoline storage & transfer operation at terminals and service stations Others - description: Open burning, landfills, & others	14.59 tpd
<b>Non-Road Mobile Sources</b>	
Non-road Equipment - Description: lawn & garden, construction, recreational vehicles. Others - Description: Locomotives, aircraft, boats	4.718 tpd
<b>Total</b>	<b>35.418 tpd</b>



**Figure 6 - 2005 Baseline Ozone Season Daily Emissions of Oxides of Nitrogen (NO<sub>x</sub>)**



Summary of the Roanoke Valley Current NOX Emissions Inventory for Calendar Year 2005	
Major Source Categories	Emissions (tons/day)
<b>Major Stationary Point Sources</b>	
28 individual facilities (Botetourt: 7, Roanoke Co.: 12, Roanoke City: 5, Salem City: 4) - Description: Includes cement production, metal works, minerals production, gas terminals.	6.56 tpd
<b>On-Road Mobile Sources</b>	
Motor Vehicles on Public Roads - <b>Description:</b> local and through traffic on the I-81 corridor. Large percentage of heavy-duty diesel trucks. Also, vehicle traffic on all other public roads from major arterials to local roads.	25.50 tpd
<b>Area Sources</b>	
Use of Solvent-based Products - Description: paints, cleaners, consumer products, & others. Gasoline Distribution & Marketing - Description: Gasoline storage & transfer operation at terminals and service stations Others - description: Open burning, landfills, & others	3.59 tpd
<b>Non-Road Mobile Sources</b>	
Non-road Equipment - Description: lawn & garden, construction, recreational vehicles. Others - Description: Locomotives, aircraft, boats	5.20 tpd
<b>Total</b>	<b>40.85 tpd</b>

The Roanoke area is well on its way to achieving the emissions reductions needed to meet the attainment year (2007) goals. In fact, 2005 emissions levels are within 1.03 tons per day of VOC and 2.57 tons per day of NO<sub>x</sub> of the 2007 attainment emissions level goals.

## **Regional/State Programs Update**

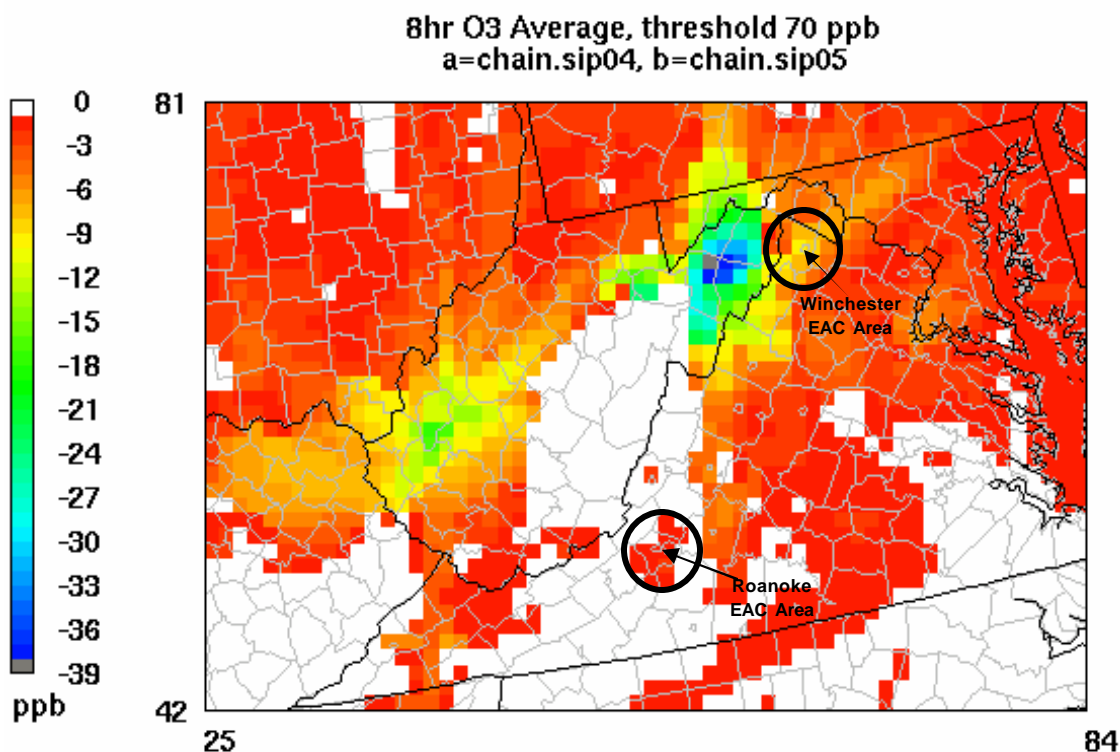
The Virginia Department of Environmental Quality (VADEQ) has implemented several control measures to assist the Roanoke area in achieving its air quality goals.

### ***1. Regional Reduction of NO<sub>x</sub> Emissions (SIP Call)***

The most significant of these programs has been the regional program to reduce NO<sub>x</sub> emissions from power plants and large industrial boilers. This regional program, commonly known as the “NO<sub>x</sub> SIP Call”, was established by the EPA to address the transport of ozone and precursor emissions in the eastern United States. Virginia, along with 22 other states became subject to this rule which now covers over 2,500 combustion unit in the control area.

To assess the impact of this program on the Roanoke area, a limited modeling analysis was performed by the VADEQ to determine the benefits of emissions reductions from selected power plants within close proximity of the EAC area. The results of this analysis shows that the reductions achieved at the four selected power plants alone have a significant impact on predicted ozone values in the Roanoke area as shown in concentration difference map below:

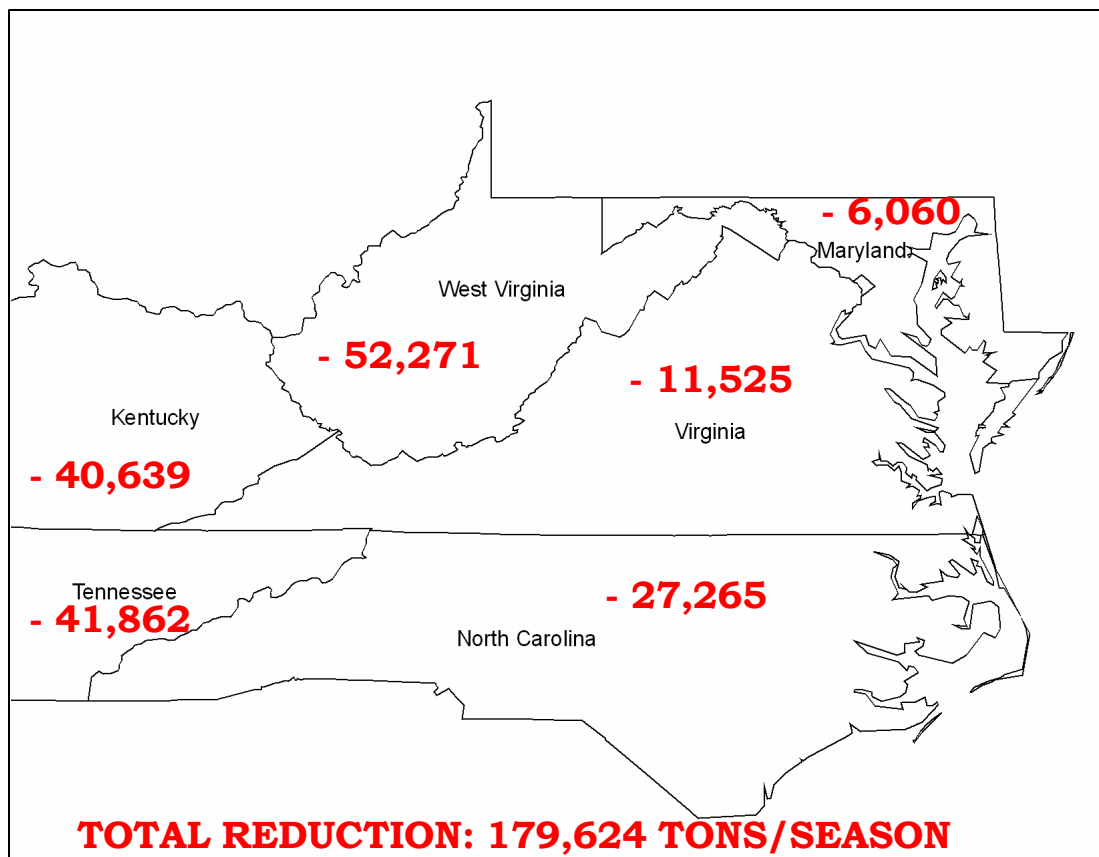
**Figure 7 – Ozone Reductions from Local Power Plant Controls**



Reduction in emissions from the four selected power plants alone since 2002 have produced ozone concentration reduction of up to 3 parts per billion in the Roanoke area. Time and resource constraints did not allow for a more comprehensive modeling analysis of the SIP Call impacts on the EAC areas and Virginia in general. However, the EPA report “Evaluating Ozone Control Programs in the Eastern United States – 2004” estimates much larger reductions in average ozone concentrations in Virginia of 7 to 23% from 1997 to 2004 with much of this reduction coming since 2002 and the implementation of the SIP Call requirements. These estimates are consistent with the analysis of the reduction of the regional ozone load present in Section 1 of this document that shows a 10 to 15 ppb reduction in transported ozone in Virginia from 1998 to 2005.

As can be predicted, these reductions in ozone are being driven by the significant reduction of NO<sub>x</sub> emissions in the SIP Call control area. To document these reductions, an assessment of NO<sub>x</sub> emissions and emissions reductions has also been performed for Virginia and surrounding states using data from the EPA Clean Air Markets Division. The results of this analysis are presented below:

**Figure 8 – NO<sub>x</sub> Emissions Reductions from 2002 to 2005**



As can be seen by this analysis, significant NO<sub>x</sub> emissions reductions are being achieved through the SIP Call program that is certainly contributing to the improvement in air quality being observed throughout the region and specifically in the EAC areas. This analysis will be updated to 2006 once the ozone season utility data becomes available.

## **2. National Low Emissions Vehicle Program**

The National Low Emissions Vehicle (NLEV) program is a voluntary clean vehicle program established by the EPA through national regulation on December 16, 1997. Due to the voluntary nature of the program, it was contingent upon agreement by a number of Northeast states and the major automobile manufacturers. Virginia opted into this program for lower vehicle emissions standards, beginning with model year 1999 vehicles and subsequently adopted a state NLEV regulation, 9 VAC 5 Chapter 200, which became effective on April 14, 1999.

This program along with the federal motor vehicle control programs, have and continue to provide substantial emissions reductions in Virginia that will assist areas like Roanoke in meeting air quality standards and goals.

## **3. Existing Source Controls and NO<sub>x</sub> RACT**

To address local point source emissions, the state extended certain existing source and Reasonably Available Control Technology (RACT) regulations to the Roanoke area to reduce the local contribution to ozone formation. These regulations were adopted by the Air Pollution Control Board in October 2003 and became effective on March 23, 2004. Compliance with these regulations was then required by November 15, 2005. These regulations mainly apply to two categories of sources which are described below.

A number of state regulations (Chapter 40) regarding existing sources of the Volatile Organic Compound (VOC) have been extended to the Roanoke area. These regulations are as follows:

- Article 5 - Synthesized Pharmaceutical Products Manufacturing Operations
- Article 6 - Rubber Tire Manufacturing Operations
- Article 11 - Petroleum Refinery Operations
- Article 24 - Solvent Metal Cleaning Operations Using Non-Halogenated Solvents
- Article 25 - Volatile Organic Compound Storage and transfer Operations
- Article 26 - Large Appliance Coating Application Systems
- Article 27 - Magnet Wire Coating Application Systems
- Article 28 - Automobile and light Duty Truck Coating Application Systems
- Article 29 - Can Coating Application Systems
- Article 30 - Metal Coil Coating Application Systems
- Article 31 - Paper and Fabric Coating Application Systems
- Article 32 - Vinyl Coating Application Systems

Article 33 – Metal Furniture Coating Application Systems  
Article 34 – Miscellaneous Metal Parts and Products Coating Application Systems  
Article 35 – Flatwood Paneling Coating Application Systems  
Article 37 – Petroleum Liquid Storage and Transfer Operations  
Article 39 – Asphalt Paving Operations (Cutback Asphalt Restrictions)

Once these regulations became effective, the VADEQ regional office identified 33 point sources in the Roanoke area that were potentially subject to one or more these regulations (not including gasoline service stations). These sources were subsequently notified of the potential applicability of these regulations by letter dated March 12, 2004.

As a result of this notification process, eight sources were determined to be exempt from these rules. The remaining sources have been determined to be in compliance with the applicable rule(s) and/or have permits which include VOC control requirements equal to or more stringent than the Chapter 40 requirements. Compliance with these regulations is specific to the individual process and regulation and mainly relies on VOC content limitations and/or emission reduction requirements. The estimate of about 1 ton per day of cumulative reductions from these requirements remains valid. The reductions from cutback asphalt restriction also remain valid (0.005 tons per day).

In addition to these controls, the gasoline bulk terminal requirements of Article 37 were also extended to Bedford County which is adjacent to the Roanoke EAC area. There are five bulk terminal facilities located in this County and all five have been issued State Operating Permits which include the Article 37 requirement. Furthermore, all these facilities are now in compliance with these requirements that provide additional VOC reductions above and beyond those claimed in the Roanoke EAP.

The second part of the control requirements involved case by case RACT determinations for major sources of NO<sub>x</sub>. Three point sources in the Roanoke area were identified as being subject to this requirement which resulted in source specific RACT determinations and permits that were submitted to the EPA and approved as separate SIP revisions as part of the overall EAP SIP. The current compliance status of these three facilities is as follows:

Roanoke Cement: A RACT permit was issued to this source on December 22, 2004. As of November 15, 2005, the emissions from the RACT applicable unit have been reduced by a combination of process controls and good combustion practices. In addition, during the plant shutdown in January 2006, the source installed low NO<sub>x</sub> burners to its cement Kiln system. The reductions achieved from these additional control should be available by the next status report.



Roanoke Electric Steel: A RACT permit was issued to this source on December 22, 2004. This permit required that NO<sub>x</sub> emissions from the source be controlled through a combination of proper operation and maintenance, and low NO<sub>x</sub> burners. The source is currently in compliance with all the conditions of this RACT permit.

Norfolk Southern Railroad: A RACT permit was issued to this source on December 22, 2004. This permit required that NO<sub>x</sub> emissions from the source be controlled by meeting a 0.4 lbs/mmBtu emission rate for the power plant boilers at the facility. Initial source testing was conducted in November 2005 which indicated a violation of RACT emission rate. Subsequently, the DEQ issued the facility a Notice of Violation (NOV). Subsequently, the source retested in March 2006 and has now demonstrated compliance with the RACT emission rate. A consent order is currently being negotiated with the source to bring closure to the permit violation and to assess a civil penalty.

Due to the fact that many of the requirements of these RACT permits did not become effective until late 2005, annual and seasonal emissions estimates resulting from these requirements are not yet available. However, it should be noted that total point source NO<sub>x</sub> emissions in the Roanoke area are already below the projected 2007 post control attainment levels as presented in the emission inventory section of this report.

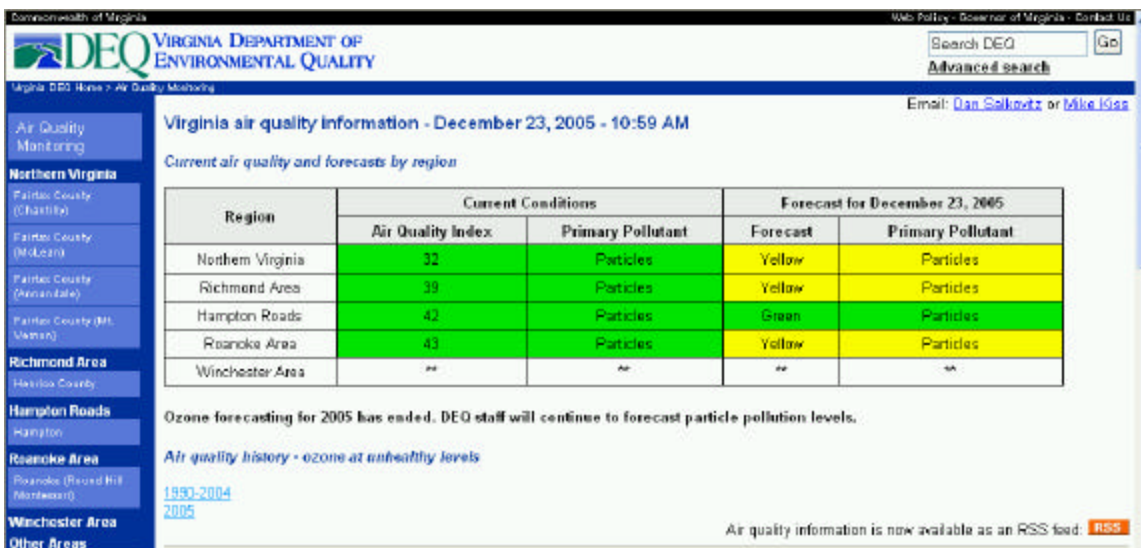
#### ***4. Enhanced Ozone Forecasting tool for the Roanoke Area***

One of the main components of the local early action program is a the establishment of an ozone action days program. This program requires a combination of mandatory and voluntary action by local governments and residents to reduce ozone precursor producing activities and emissions. In order to implement such a program, daily air quality forecasts are needed. To support this program, the VADEQ has completed the following actions to enhance the ozone forecast and health advisory program for the Roanoke area:

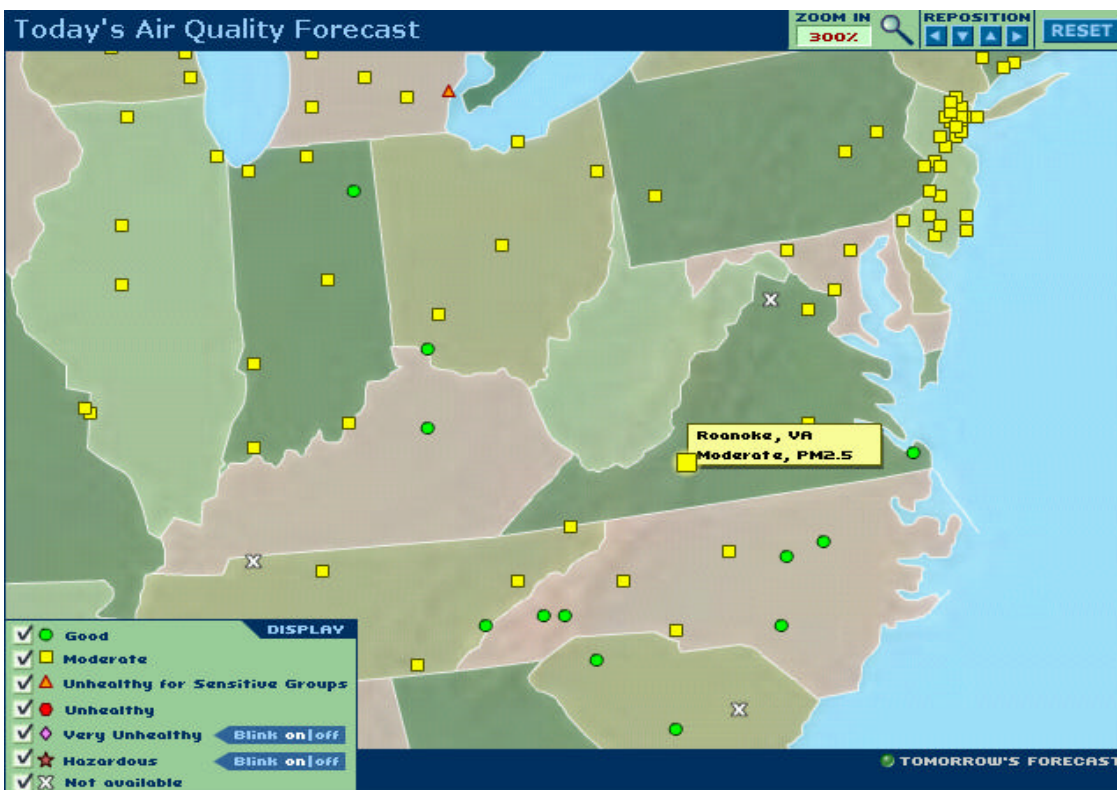
- The VADEQ contracted with Sonoma Technologies Inc. to develop an enhanced ozone forecasting tool for various areas in Virginia, including the Roanoke area. This work has been completed.
- An additional meteorologist has been hired to support the VADEQ air quality forecast and advisory program.
- The forecasts for the Roanoke area have been updated to reflect the 8-hour ozone standard. In addition, daily forecasts for fine particulate matter are now being issued for the Roanoke area all year.

- The Roanoke area has been updated on the VADEQ air quality forecast webpage, and on the EPA's AIRNOW national forecast webpage to reflect these changes. These sites are shown in the figures below:

**Figure 8 – VADEQ Air Quality Forecast Page**



**Figure 9 – EPA AIRNOW Air Quality Forecast Page**



## **5. School Bus Emissions Control Retrofit Program**

As part of a EPA/VADEQ funded and administered program, Roanoke County and the City of Roanoke have completed projects to retrofit a significant number of school buses with emission control technologies. The results of these projects are as follows:

Roanoke County: 100 school buses retrofitted with diesel oxidation catalysts (DOC) at a total cost of \$144,000.

Roanoke City: 121 school buses retrofitted with DOC. The electronic control modules (ECMs) on 19 buses have also been reprogrammed to further reduce NO<sub>x</sub> emissions. Total cost of the project was \$124,000.

## **6. Stage I Vapor Recovery Control at Service Stations**

Section 9 VAC 5-40-5200 B. 3. of Article 37 of the Chapter 40 VOC regulations specifically requires the installation and use of Stage I vapor control and recovery systems at services stations in Roanoke County and the Cities of Roanoke and Salem. A final compliance review has been completed and has reaffirmed that 100% compliance with this regulation has been achieved in the area.

## **7. State Open Burning Regulation (NEW)**

On June 21, 2006 the State Air Pollution Control Board gave final approval to the expansion of a more restrictive seasonal open burning control program to the Roanoke area. This more restrictive program will replace the local program when it becomes effective in 2007.

## **Control Program and Measures Summary**

In general, the Roanoke area and its state and federal partners have been very successful in implementing the commitments contained in the Early Action Plan. A summary of the control measures and estimated reductions in 2007 is presented below. No changes have occurred in the emission reduction estimates since the 2004 SIP. The Appendix to this report contains a summary table of the control measures implemented in the Roanoke area. More details on local implementation of measures are provided in the local area status report for June 2006.

### Control Measures & Estimated Emissions Reductions (2007)

<b>Emissions Control Measures</b>	<b>VOC (tpd)</b>	<b>NO<sub>x</sub> (tpd)</b>	<b>Modeled</b>
<b>State/Federal Area Source Controls</b>			
Stage I Vapor Recovery at Gasoline Service Stations (Federally Enforceable)	1.756	0.000	YES
Architectural Products – Federal Rule (Federally Enforceable)	0.372	0.000	YES
Consumer Products – Federal Rule (Federally Enforceable)	0.178	0.000	YES
Metal Cleaning Solvents – Federal Rule (Federally Enforceable)	0.163	0.000	YES
Motor Vehicle Refinishing – Federal Rule (Federally Enforceable)	0.158	0.000	YES
Cutback Asphalt – State Rule (Federally Enforceable)	0.005	0.000	YES
<b>Emissions Control Measures</b>	<b>VOC (tpd)</b>	<b>NO<sub>x</sub> (tpd)</b>	<b>Modeled</b>
<b>Subtotals:</b>	<b>2.632</b>	<b>0.000</b>	
<b>Federal Non-Road Source Controls</b>			
Small Gasoline Engine Standards – Federal Rule (Federally Enforceable)	1.681	0.059	YES
Diesel Engine Standards – Federal Rule (Federally Enforceable)	0.158	0.969	YES
Locomotive Engine Standards – Federal Rule (Federally Enforceable)	0.000	1.112	YES
Large Gasoline Engine Standards – Federal Rule (Federally Enforceable)	0.146	0.546	YES
Recreational Engine Standards – Federal Rule (Federally Enforceable)	0.015	0.000	YES
<b>Subtotals:</b>	<b>1.995</b>	<b>2.686</b>	
<b>Federal Mobile Source Controls</b>			
Previous Motor Vehicle Standards – Federal Rule (Federally Enforceable)	6.343	7.600	YES
Tier 2 Vehicle Standards – Federal Rule (Federally Enforceable)	0.917	3.799	YES
Heavy Duty Diesel Standards – Federal Rule (Federally Enforceable)	0.001	0.156	YES
<b>Subtotals:</b>	<b>7.261</b>	<b>11.555</b>	
<b>State/Local Early Action Plan Controls</b>			
Existing Source CTG RACT Controls – State Rule (Federally Enforceable)	1.098	0.790	YES
Ozone Action Days Program – State/Local (Mandatory/Voluntary)	0.918	0.611	YES
Open Burning Restrictions – Local (Soon to be replaced by State Rule)	0.564	0.238	NO
All Other Local Programs – Local (Voluntary)	0.020	0.228	NO
<b>Subtotals:</b>	<b>2.580</b>	<b>1.639</b>	
<b>TOTALS:</b>	<b>14.468</b>	<b>15.880</b>	